

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

THE GOVERNMENT DEVELOPMENT BANK  
FOR PUERTO RICO,

Applicant.

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.<sup>1</sup>

THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF THE DEBTORS (OTHER THAN

COFINA),

Plaintiff,

V.

THE COMMONWEALTH OF PUERTO RICO, THE  
PUERTO RICO FISCAL AGENCY AND FINANCIAL  
ADVISORY AUTHORITY, THE GOVERNMENT

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

DEVELOPMENT BANK FOR PUERTO RICO, AND THE :  
FINANCIAL OVERSIGHT AND MANAGEMENT :  
BOARD FOR PUERTO RICO, :

Defendants. :

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**INFORMATIVE MOTION OF OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS REGARDING OCTOBER 3, 2018 HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all title III Debtors (other than COFINA) (the “Committee”) hereby submits this informative motion in response to the Court’s *Order Regarding Procedures for Attendance, Participation and Observation of the October 3, 2018 Hearing*, dated September 26, 2018 [Case No. 18-1561, Docket No. 167, Case No. 17-3283, Docket No. 3975, and Adv. Proc. No. 18-0101, Docket No 10] (the “Scheduling Order”) and respectfully states as follows:

1. Luc A. Despins and Nicholas A. Bassett of Paul Hastings LLP will appear in person on behalf of the Committee at the Hearing (as defined in the Scheduling Order) in Courtroom 17C of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, NY, and address, as necessary, the following matters:
  - (a) *Notice of Intention to Object Regarding Purported Qualifying Modification for Government Development Bank* [Case No. 18-1561, Docket No. 59];
    - (i) *Objection of Financial Oversight and Management Board for Puerto Rico as the Administrative Supervisor of the Government Development Board for Puerto Rico to the Official Committee of Unsecured Creditors’ Notice*

- of Intention to Object to Qualifying Modification for Government Development Bank* [Case No. 18-1561, Docket No. 111];
- (ii) *GDB and AAFAF's Objection to the Official Committee of Unsecured Creditors' Standing to Object to the Approval Application* [Case No. 18-1561, Docket No. 112];
- (iii) *Omnibus Response of Official Committee of Unsecured Creditors to GDB/AAFAF's and Oversight Board's Standing Objections* [Case No 18-1561, Docket No. 131];
- (iv) *GDB and AAFAF's Reply to the Official Committee of Unsecured Creditors' Omnibus Response to GDB/AAFAF's and Oversight Board's Standing Objections* [Case No 18-1561, Docket No. 170]
- (v) *Financial Oversight and Management Board for Puerto Rico's Reply to Omnibus Response of Official Committee of Unsecured Creditors to GDB/AAFAF's and Oversight Board's Standing Objections* [Case No 18-1561, Docket No. 171];
- (b) *Official Committee of Unsecured Creditors' Motion for Order Granting Derivative Standing to Act on Behalf of Title III Debtors for Certain Limited Purposes and Other Related Relief With Respect to Restructuring of Government Development Bank for Puerto Rico* [Case No. 17-3283, Docket No. 3881];
- (i) *Objection of Financial Oversight and Management Board to Official Committee of Unsecured Creditors' Motion for Order Granting Derivative Standing to Act on Behalf of Title III Debtors for Certain Limited Purposes and Other Related Relief With Respect to Restructuring of*

*Government Development Bank for Puerto Rico* [Case No. 17-3283, Docket No. 3959];

(ii) *Objection of the Government Development Bank for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority to the Official Committee of Unsecured Creditors' Derivative Standing Motion* [Case No. 17-3283, Docket No. 3961];

(c) *Complaint of Official Committee Of Unsecured Creditors of All Title III Debtors (Other Than COFINA) for Declaratory Judgment with Respect to GDB Restructuring* [Adv. Proc. No. 18-0101, Docket No. 1];

(i) *Financial Oversight and Management Board's Memorandum of Law in Support of Its Motion to Dismiss Complaint for Lack of Standing* [Adv. Proc. No. 18-0101, Docket No. 7];

(ii) *GDB and AAFAF's Motion to Dismiss Complaint for Lack of Standing* [Adv. Proc. No. 18-0101, Docket No. 8];

(1) *Memorandum of Law in Support of GDB and AAFAF's Motion to Dismiss Complaint for Lack of Standing* [Adv. Proc. No. 18-0101, Docket No. 9];

(d) Any objections, responses, statements, joinders, or replies to any of the foregoing pleadings; and

(e) Any statements made by any party in connection with the title III cases or any adversary proceeding pending therein.

2. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will also be attending, on behalf of the Committee, the Hearing by video teleconference in the United States District Court for the District of Puerto Rico.

*[Remainder of page intentionally left blank.]*

WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: September 28, 2018

/s/ Luc A. Despins

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- and -

/s/ Juan J. Casillas

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